

Defendant No. 1

Name	<u>GREG ABBOTT</u>
Job or Title <i>(if known)</i>	<u>GOVERNOR OF TEXAS</u>
Street Address	<u>1100 SAN JACINO (STATE INSURANCE BUILDING)</u>
City and County	<u>AUSTIN, TRAVIS COUNTY</u>
State and Zip Code	<u>TEXAS 78701</u>
Telephone Number	<u>(512) 463-2000</u>
E-mail Address <i>(if known)</i>	<u>info@gregabbott.gov</u>

Defendant No. 2

Name	<u>RANDALL COUNTY</u>
Job or Title <i>(if known)</i>	<u>MUNICIPALITY</u>
Street Address	<u>2309 RUSSELL LONG BOULEVARD SUITE 101</u>
City and County	<u>CANYON, RANDALL</u>
State and Zip Code	<u>TEXAS 79015</u>
Telephone Number	<u>(806) 468-5600</u>
E-mail Address <i>(if known)</i>	<u>districtclerk@randallcounty.gov</u>

Defendant No. 3

Name	<u>NORTHWEST TEXAS HEALTHCARE SYSTEM</u>
Job or Title <i>(if known)</i>	<u></u>
Street Address	<u>1501 COULTER STREET SOUTH</u>
City and County	<u>AMARILLO, POTTER COUNTY</u>
State and Zip Code	<u>TEXAS 79106</u>
Telephone Number	<u>(806) 354-1000</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 4

Name	<u>JENNINGS COUNSELING SERVICES</u>
Job or Title <i>(if known)</i>	<u>LICENSED PROFESSIONAL COUNSELOR</u>
Street Address	<u>7404 GOLDEN POND PLACE #300</u>
City and County	<u>AMARILLO, RANDALL COUNTY</u>
State and Zip Code	<u>TEXAS 79121</u>
Telephone Number	<u>(806) 356-9047</u>
E-mail Address <i>(if known)</i>	<u>mymail@mailservice.com</u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 USC 1983- DEPRIVATION OF RIGHTS UNDER COLOR OF LAW
42 USC 1985 - CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS
MONELL CLAIMS:

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
\$ 7,000,000,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

1. 6802 Drive Amarillo, Randall, Texas: Lessner daughters taken w/ no Court Order/Warrant. Parents threatened by RCSD. SW Tims promised the Lessner parents after being forced to surrender their children the removal was only for 24 hours.
2. 2309 Russell Long Blvd. Canyon, Randall, Texas: Lessner parents lost parental rights illegally. Lessner father was convicted wrongfully of aggravated sexual assault. The trial was held unconstitutionally and without due process of law.
3. LPC lied to the court and refused to speak with Lessner parents. Accusing the Lessner mother of criminal acts to avoid conferences.
4. Kaitlyn Lessner was taken to NWTB where she was illegally searched without the Lessner parents' permission.
5. Greg Abbott claims he has no jurisdiction when the Lessner parents filed multiple complaints on DFPS.

B. What date and approximate time did the events giving rise to your claim(s) occur?

(SEE ATTACHED)

1. April 18th, 2017 @2320 hours
2. Various dates
3. Various dates

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

4. April 19th, 2017 Approx. 0230 hours
 5. Various Dates (there are at least three letters from the Governor of Texas)
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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
(SEE ATTACHED)

DOCUMENTATION PROVIDED.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.
(SEE ATTACHED)

DOCUMENTATION PROVIDED.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.
(SEE ATTACHED)

The Lessner family has suffered psychological, emotional, spiritual, and physical damages due to negligence in addition they have also suffered losses of valuables and humiliation from the said defendants. The Lessner family has lost more than \$100,000.00 filing paperwork and hiring various attorneys. The Lessner children will undoubtedly need counseling for the damage done to them while in state custody. Constitutional rights violations and denial of due process were practiced in this case, allowing corruption and injustice to rule the courts in this case.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff

AUDREY MAE LESSNER

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address